

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

VIRGINIA COLE, individually and on behalf
of all others entities similarly situated,

Plaintiff,

vs.

MG LLC d/b/a TRANZACT and JOHN DOE
CORPORATION,

Defendants.

No. 3:23-cv-1083-EJR-BDH

**MOTION FOR ENTRY
OF STIPULATED PROTECTIVE ORDER**

Defendant moves this Court to approve and enter the [Proposed] Stipulated Protective Order, filed herewith as Exhibit A, which describes the agreed-upon order and is signed by all parties.

Dated: December 13, 2023

Respectfully submitted,

By: /s/ Lauri A. Mazzuchetti

Lauri A. Mazzuchetti (*pro hac vice*)

KELLEY DRYE & WARREN LLP

One Jefferson Road, 2nd Floor

Parsippany, NJ 07054

Tel: (973) 503-5900

Fax: (973) 503-5950

lmazzuchetti@kelleydrye.com

*Counsel for Defendant MG LLC d/b/a
Tranzact*

**DEFENDANT TRANZACT'S CERTIFICATE OF SERVICE FOR ITS
MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant Local Rule 5.01, I hereby certify that on December 13, 2023, a copy of the foregoing motion and accompanying exhibit were filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt which are listed below:

Anthony I. Paronich	Scott Alan Lanzon
PARONICH LAW, P.C.	THE LANZON FIRM
350 Lincoln Street Suite 2400	550 W Main Street Suite 550
Hingham, MA 02043	Knoxville, TN 37902
617-485-0018	Tel: 865-212-0955
anthony@paronichlaw.com	scott.lanzon@gmail.Com

Edward A. Broderick	
BRODERICK LAW, PC	<i>Counsel for Plaintiff</i>
176 Federal Street 5th Floor	
Boston, MA 02110	
(617) 738-7080	
ted@broderick-law.Com	

Dated: December 13, 2023
Parsippany, New Jersey

/s/ Lauri A. Mazzuchetti
Lauri A. Mazzuchetti